

**From:** [catherine kassenoff](#)  
**To:** [Gus Dimopoulos](#); [Atty Bruggemann](#); [Kassenoff, Allan \(Shld-NY-IP-Tech\)](#)  
**Subject:** Motion for disqualification of your co-counsel Carol Most  
**Date:** Friday, September 9, 2022 8:50:15 PM

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I want to be perfectly, 100% clear: if you oppose this motion, forcing me to submit to a reply that I succeed on, I will do the following:

1. Move against you for all legal expenses incurred in bringing this motion,
2. Move against you for all legal expenses incurred in connection with any collateral proceedings, including but not limited to my demand for sanctions, the proceedings related to Carol Most's claim to legal fees, the malpractice claim against Carol Most, disciplinary proceedings against you, your client and Most, and any hearings related to the subject matter of my disqualification motion.

I will also likely bring a federal lawsuit for the false arrest and conspiracy to deprive me of my parental rights that you orchestrated with her. You ruined my livelihood, my reputation, my Constitutional right to parent my children, and my career, among other things, with your scheme to have me falsely arrested and prosecuted.

Finally, we await your answer on your 9.30.22 deposition as well, Mr. Dimopoulos. I will soon be noticing your client's deposition. Please advise whether you will be representing him.